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10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA, SOUTHERN DIVISION

12 ***

13 JACQUELYN NICKLER,

14 Plaintiff,

15 vs.

16 CLARK COUNTY, a political subdivision of
the State of Nevada, including Clark County
17 District Attorney's Office and Clark County
Court Administration Office,

18 Defendants.
19

CASE NO. 2:18-cv-01668-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

[SECOND REQUEST]

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21 Pursuant to LR 6-1 and LR 26-4, the parties, by and through their respective counsel of
22 record, hereby stipulate and request that this Court extend discovery in the above-captioned case
23 ninety (90) days from the current deadline of January 29, 2021, up to and including Thursday, April
24 29, 2021. In addition, the parties request that the all other future deadlines contemplated by the
25 Discovery Plan and Scheduling Order be extended pursuant to Local Rule. In support of this
26 Stipulation and Request, the parties state as follows:

- 27 1. On May 15, 2020 Plaintiff filed her Second Amended Complaint in the United
28 States District Court.

1. The parties will continue participating in written discovery.
2. Defendant will take the deposition of Plaintiff.
4. Plaintiff will take the deposition of Defendant's Person Most Knowledgeable.
5. The parties may take the depositions of any and all other witnesses garnered through discovery.

The parties aver, pursuant to Local Rule 26-4, that good cause exists for the following requested extension. This Request for an extension of time is not sought for any improper purpose or other purpose of delay. Rather, it is sought by the parties solely for the purpose of allowing sufficient time to conduct discovery.

Extension or Modification of The Discovery Plan and Scheduling Order. LR 26-4 governs

modifications or extension of the Discovery Plan and Scheduling Order. Any stipulation or motion to extend or modify that Discovery Plan and Scheduling Order must be made no later than twenty-one (21) days before the expiration of the subject deadline and must comply fully with LR 26-4.

This is the second request for extension of time in this matter. The parties respectfully submit that the reasons set forth above constitute compelling reasons for the short extension.

The following is a list of the current discovery deadlines and the parties' proposed extended deadlines:

Scheduled Event	Current Deadline	Proposed Deadline
Discovery Cut-off	<i>Friday, January 29, 2021</i>	<i>Thursday, April 29, 2021</i>
Deadline to Amend Pleadings or Add Parties	<i>Monday, November 2, 2020</i>	<i>Closed</i>
Expert Disclosure pursuant to FRCP26 (a)(2)	<i>Tuesday, December 1, 2020</i>	<i>Closed</i>
Rebuttal Expert Disclosure pursuant to FRCP. 26(a)(2)	<i>Thursday, December 31, 2020</i>	<i>Closed</i>
Dispositive Motions	<i>Monday, March 1, 2021</i>	<i>Monday, May 31, 2021</i>
Joint Pretrial Order	<i>Wednesday, March 31, 2021</i>	<i>Wednesday, June 30, 2021</i>

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

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1 WHEREFORE, the parties respectfully request that this Court extend the discovery
2 period by ninety (90) days from the current deadline of January 29, 2021 up to and including April
3 29, 2021, and the other dates as outlined in accordance with the table above.

4 DATED this 8th day of January, 2021.

DATED this 8th day of January, 2021.

5 LEWIS BRISBOIS BISGAARD & SMITH LLP

KEMP & KEMP, ATTORNEYS AT LAW

6 /s/ Cheryl A. Grames

/s/ James P. Kemp

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14 *Attorney for Defendant*

15 *Clark County*

16 **ORDER**

17 **IT IS SO ORDERED:**

18 Dated this 11th day of January, 2021.

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20 **UNITED STATES MAGISTRATE JUDGE**